

Table 1. Rosemont Mine HMMP Mitigation

Resource Type	Rosemont Mine Site Impacts (ac.)	Proposed Mitigation Sites	Reestablishment	Rehabilitation	Preservation
Upland Buffer	4074¹	Sonoita Creek Ranch			705²
		Fullerton Ranch			1,463²
		Davidson Canyon Parcels			446³
Total	4074		0.00	0.00	2168
Upland Riparian Buffer	Direct: 588	Sonoita Creek Ranch		105⁴	321²
	Indirect: 664	Fullerton Ranch			249²
	(FEIS, Table 108)	Davidson Canyon Parcels			83³
Total	1252		0.00	105	570
Ephemeral Waters of the U.S.	Direct: 40.4	Sonoita Creek Ranch	38⁷	25 6⁵	
		Fullerton Ranch		51	
		Davidson Canyon Parcels			16³
Total	40.4		38	76	0.00
Ephemeral Waters of the U.S.	Indirect: 28.4⁶	Pantano Dam		28.4⁶	
Total	28.4		0.00	0.00	0.00
Seeps and Springs (no.)	Direct: 7 springs	Sonoita Creek Ranch			
	Indirect: 69	Fullerton Ranch			
		Davidson Canyon Parcels		3⁵	
Total	76 springs		0.00	0.00	0.00

See footnotes, p. 2

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¹ Pima County letter to Corps dated 12.30.13 estimates project site at 5431 acres. Riparian habitat and drainages were subtracted for a total of 4074 acres.

² These acreages should be evaluated under preservation. Non-aquatic resources can only be used as compensatory mitigation for impacts to aquatic resources authorized by DA permits when those resources are *essential to maintaining the ecological viability of adjoining aquatic resources* (2008 Mitigation Rule).

³ Davidson Canyon Parcels are not under threat and therefore not appropriate as preservation. Onsite aquatic resources are subject to groundwater drawdown (*i.e.*, Questa, Barrel, and Unnamed springs, seeps, and intermittent stream reaches) and stormwater diversions from mine.

⁴ Reestablishment results in rebuilding a former aquatic resource and results in a gain in aquatic resource areas and functions. Therefore, this would constitute rehabilitation (2008 Mitigation Rule, 33 CFR 332.2).

⁵ The ponds are identified as a conservation measure under the USFWS B.O. and therefore not acceptable as mitigation under §404 CWA (Preamble 2008 mitigation rule).

⁶ This acreage does not include indirect impacts due to groundwater drawdown from mine pit.

⁷ Based on examination of calculations of constructed channel lengths and cross sections (Water & Earth, 2014), the 38 acres of proposed mitigation appears to be overestimated. Also, portions of the 10 acres of proposed mitigation for existing ephemeral channels should be assessed as rehabilitation and not as reestablishment.

⁸ Discharge of 400 AFA of base flow into a MUSF at Pantano Dam is not acceptable mitigation.